

Appendix No. ____
to the minutes of the meeting of the
Board of Directors of
Kazyna Capital Management
Joint Stock Company
dated _____ No. ____

Approved by
the decision of the Board of Directors
of Kazyna Capital Management
Joint Stock Company
dated _____ (Minutes No.____)

**Regulations
on the Anti-Corruption Compliance Service of
Kazyna Capital Management Joint Stock Company**

Nur-Sultan, 2021

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Chapter 1. General provisions

1. These Regulations on the Anti-Corruption Compliance Service of Kazyna Capital Management Joint Stock Company (hereinafter referred to as the Company) have been developed in accordance with the legislation of the Republic of Kazakhstan and on the basis of methodological recommendations on the organization of the anti-corruption compliance institute in quasi-public sector entities approved by the Chairman of the Anti-Corruption Agency of the Republic of Kazakhstan (Anti-Corruption Service) dated December 30, 2020 (hereinafter – Methodological Recommendations) in order to assist in the implementation of anti-corruption compliance and the formation of a unified approach to the implementation of the anti-corruption policy of Kazyna Capital Management JSC and defines the status, goals, objectives, functions, powers, rights and obligations, as well as the responsibility of the Anti-Corruption Compliance Service of the Company (hereinafter - ACS), the main provisions on planning activities, reporting and interaction of the ACS with other bodies and structural divisions of the Company.

2. The concepts used in these Regulations are identical to the concepts defined by the legislation of the Republic of Kazakhstan, the Charter and internal documents of the Company.

3. ACS is the Company's service, the main task of which is to ensure compliance by the Company and its employees with the legislation of the Republic of Kazakhstan on combating corruption.

The term of office of ACS established by the Board of Directors is 3 years. The term of office of the head of the ACS coincides with the term of office of the ACS.

4. The ACS in carrying out its activities is guided by:

- 1) the legislation of the Republic of Kazakhstan;
- 2) The Charter of the Company, these Regulations and other applicable internal documents of the Company, and decisions of the Company's bodies.

5. Determination of the quantitative composition and working procedure of the ACS, appointment and termination of the powers of its head and employees, determination of the amount and other conditions of remuneration are carried out by decisions of the Board of Directors of the Company.

The assessment of the activities of the ACS, the determination (target and actual values) of the key performance indicators of the head of the ACS is carried out in accordance with the provisions of regulatory internal documents approved by the Board of Directors of the Company.

6. The qualification requirements of the head and employees of the ACS, their official duties, rights and responsibilities are established in the job descriptions, taking into account the legislation of the Republic of Kazakhstan and these Regulations in accordance with the Appendix to these Regulations.

7. Social support, guarantees, and vacation pay for the head and employees of the ACS are carried out in accordance with the provisions of the Company's internal documents applicable to other employees of the Company in the part that

does not contradict the norms of the legislation of the Republic of Kazakhstan, these Regulations, the terms of remuneration for the head and employees of the ACS established by the Board of Directors of the Company.

Chapter 2. ACS status

8. In order to ensure independence and objectivity, the ACS is a service of the Company, which is directly subordinate to the Board of Directors of the Company and reports to it on the work done.

The Head of the ACS interacts directly with the Board of Directors of the Company.

9. The head of the ACS has free access to members of the Board of Directors, the Management Board, and heads of structural divisions of the Company and organizations, fifty or more percent of voting shares (participation shares in the authorized capital) of which directly or indirectly belong to the Company.

10. The activities of the ACS are independent of the influence of the members of the Company's Management Board and other persons in order to properly perform the tasks and functions assigned to it.

11. In order to ensure the objectivity and impartiality of the activities, the head and employees of the ACS should not be involved in any activity that can subsequently be checked (evaluated) when performing compliance control in the Company.

Chapter 3. Goals, principles, tasks and functions of the ACS

12. The main purpose of the ACS activity is to ensure compliance by the Company and its employees with the legislation of the Republic of Kazakhstan on combating corruption, as well as monitoring the implementation of anti-corruption measures.

13. The implementation of anti-corruption compliance is based on the following principles:

1) the interest of the Company's management in the effectiveness of anti-corruption compliance;

2) the sufficiency of the powers and resources necessary to perform the tasks of the ACS;

3) regularity of corruption risk assessment;

4) information openness of the anti-corruption compliance service;

5) continuity of the implementation of anti-corruption compliance in the Company.

The head and employees of the ACS must be impartial and nonprejudicial in their work and avoid conflicts of interest.

14. The objectives of the Company's ACS are:

1) to ensure the compliance with external regulatory requirements and best international practices on anti-corruption issues;

2) to ensure compliance with the basic principles of countering the interaction of corruption in accordance with the Law of the Republic of Kazakhstan "On Combating Corruption" (the Law);

3) to identify, assess and reassess corruption risks,

4) to implement effectively system of anti-corruption measures in accordance with the Law.

5) to conduct verifications of contractors who have submitted applications for participation in procurement, applying for sponsorship assistance for compliance with the requirements of the legislation of the Republic of Kazakhstan and internal regulatory documents of the Company and its subsidiaries within the competence of the ACS;

6) to identify and verify potential partners according to the "Know Your Client" procedure;

7) to account affiliated persons of the Company;

8) to maintain a list of insiders and monitor the use of insider information;

9) to form compliance culture.

15. In accordance with the main tasks, the ACS in the appropriate manner performs the following functions:

1) development of internal documents on anti-corruption issues in the Company;

2) development and updating of standards and policies in the field of anti-corruption compliance;

3) conducting explanatory activities on anti-corruption issues and the formation of an anti-corruption culture;

4) taking measures to identify, monitor and resolve conflicts of interest;

5) monitoring for compliance by the Company's employees belonging to the category of persons equated to persons authorized to perform state functions with anti-corruption restrictions in accordance with the Law;

6) development of corporate ethical values;

7) monitoring compliance by the Company's employees, as well as the Corporate Code of Ethics (if any);

8) conducting an internal analysis of corruption risks;

9) ensuring public disclosure of information on the results of the internal analysis of corruption risks;

10) conducting official inspections on the basis of appeals (complaints) about corruption and/or participation in them;

11) coordination of work to reduce corruption risks in the Company's activities;

12) assistance to the authorized anti-corruption body in conducting an external analysis of corruption risks in the Company's activities;

13) monitoring and analysis of changes in anti-corruption legislation, judicial practice in cases related to corruption.

14) ensuring the inclusion in civil law contracts concluded in the Company, including contracts on procurement of provisions providing for mandatory

compliance by the parties to the contract with anti-corruption legislation, business ethics and integrity, principles of fair competition.

Chapter 4. Rights and obligations of the ACS

16. In order to implement the assigned tasks, the ACS has the right:

1) to request and receive information and materials from the Company's structural divisions, including those constituting commercial and official secrets, within the approved procedures regulated by the Company's internal documents;

2) to initiate the submission of issues related to their competence to the Board of Directors for consideration;

3) to initiate official inspections on incoming reports of possible corruption offenses or violations of the legislation of the Republic of Kazakhstan on combating corruption;

4) to participate in the development of projects, regulatory legal acts and their implementation within their competence;

5) to organize and hold meetings on issues related to the competence of the ACS;

6) to respect the confidentiality of information about the Company and its affiliates, insider information that became known during the implementation of the functions of the ACS;

7) to ensure the confidentiality of persons who have applied to the anti-corruption compliance service on alleged or actual facts of corruption, violations of the corporate code of ethics and other internal policies and procedures on anti-corruption compliance;

8) to promptly inform the Board of Directors of any situations related to the presence or potential possibility of violation of legislation in the field of anti-corruption;

9) to perform other actions that do not contradict the legislation of the Republic of Kazakhstan.

17. The following responsibilities are assigned to the ACS:

1) to timely and at the proper level perform the tasks and functions of the ACS;

2) to express a professional attitude to work when collecting, evaluating, discussing and transmitting information about controlled business processes, systems, documents and events;

3) to assist the Company's managers in the development of measures (corrective, preventive actions) based on the results of inspections, as well as to monitor progress in the implementation of these measures;

4) to perform other tasks and participate in other events at the request or on behalf of the Board of Directors of the Company;

5) to improve knowledge, skills and other competencies through continuous professional development, and to possess (collective) knowledge and skills necessary to perform their official duties.

Chapter 5. The ACS's liability and restrictions in activities

18. The ACS is responsible to the Board of Directors of the Company:

1) for untimely and poor-quality performance of tasks and functions of the ACS;

2) for non-fulfillment of their duties in accordance with these Regulations, other internal documents of the Company and the legislation of the Republic of Kazakhstan.

19. For non-performance or improper performance of official duties by the decision of the Board of Directors of the Company, disciplinary punishment is applied to the head of the ACS on the terms and in accordance with the procedure established by the legislation of the Republic of Kazakhstan and internal documents of the Company.

20. The financial responsibility of the head and employees of the ACS, the procedure for compensation for damage or loss (if any) are determined by the legislation of the Republic of Kazakhstan and internal documents of the Company.

21. The head and employees of the ACS must not:

1) initiate or carry out actions that are not directly related to the activities of the ACS;

2) be involved in any activities that may subsequently be subject to compliance control, and be engaged in checking the activities or functions performed by him/her;

3) participate in any activity that could damage the impartiality of the audit or be perceived as causing such damage;

4) use confidential information for personal interests or in any other way contrary to the legislation of the Republic of Kazakhstan, the Charter and other internal documents of the Company;

5) violate the norms of business ethics;

6) to manage the actions of employees of structural divisions, except in cases when these employees are appointed in accordance with the established procedure to participate in conducting compliance inspections;

7) accept gifts and use services, as a result of which the independence, objectivity and impartiality of the ACS may be damaged or which may be perceived as causing such damage.

22. The head of the ACS may not be elected to the Board of Directors and executive body of the Company and organizations, fifty or more percent of the voting shares (participation shares in the authorized capital) of which directly or indirectly belong to the Company.

23. It is not recommended to elect the head of the ACS to the committee, commission or group (on procurement, inventory or other issues) created by the Company as a member with the right to sign or vote, except in cases of participation as experts, consultants, observers.

24. The head of the ACS should not take part in the events (inspections, official investigations, etc.) that may lead to a conflict of interests (the presence of financial, property, kinship or any other interest in the framework of the event).

Chapter 6. ACS Performance Reports

25. The ACS carries out its activities on the basis of the annual Anti-Corruption Compliance Program approved by the Board of Directors of the Company.

26. Annually, by December 31, the ACS develops and approves by the Board of Directors an annual Anti-Corruption compliance program for the next year.

27. The planning process (development of an Anti-Corruption Compliance Program) is entrusted to the head of the ACS and consists of the following elements:

- 1) collection, analysis of information and documents related to the Company's activities;
- 2) assessment-determination of the Company's activities with the highest degree of compliance risks;
- 3) definition of the goals and objectives of the ACS activities;
- 4) determination of deadlines for the fulfillment of set goals and objectives, as well as means of monitoring their achievement;
- 5) preparation and submission for approval of an Anti-Corruption compliance program.

28. The ACS ensures the implementation of the Anti-Corruption Compliance Program and quarterly, no later than the second month following the reporting quarter, submits reports on its activities to the Board of Directors.

29. Reports on the activities of the ACS are preliminarily reviewed and approved by the relevant Committee under the Board of Directors in order to develop recommendations for the Board of Directors.

30. The report should include information about the main results of the work of the ACS and recommendations for the Company's activities. It should contain objective, constructive and complete information in a concise form to enable the recipients of the report to quickly review the results of the work.

31. The report on the activities of the ACS may include (not limited to):

- 1) information on the implementation of the Anti-Corruption Compliance Program in terms of specific tasks for the reporting period, the causes and factors of deviations from the plan, if any;
- 2) information about significant facts of violations identified by the ACS, recommendations issued, measures taken or reasons for not accepting recommendations;
- 3) information about the presence of compliance risks in business processes, internal regulatory documents identified by the ACS, recommendations issued, measures taken or reasons for not accepting recommendations;
- 4) other measures and recommendations to prevent and minimize

compliance risks;

5) the results of the ACS inspections and monitoring of the ACS recommendations' implementation;

6) analysis and generalization of appeals from individuals and legal entities, including through the hotline, in order to improve the work and eliminate the causes of complaints;

7) information on the consideration of major transactions of the Company and transactions in which there is an interest, including an increase in the Company's liabilities by 10% or more of the amount of equity, the consideration of which falls within the exclusive competence of the Board of Directors or the Sole Shareholder.

8) the status of compliance risks and identified risks of corruption and legalization of proceeds from crime and terrorist financing;

9) information about other activities (work) carried out by the ACS during the reporting period (on interaction with relevant organizations, regulatory authorities, participation in trainings, implementation of individual development plans, etc.).

Chapter 7. Interaction of the ACS with the bodies, structural divisions of the Company

32. Internal documents regulating the procedure for the activities of the ACS, audit plans and periodic reports of the ACS (their drafts) are subject to:

1) submission to the members of the Management Board of the Company for the purpose of informing;

2) consideration by the Board of Directors of the Company. Based on the results of consideration of (draft) documents of the ACS, the Board of Directors of the Company approves them or makes other decisions in accordance with its competence.

33. In order to organize the work of the ACS, the Chairman of the Management Board of the Company (or another person authorized by him/her) makes decisions on:

1) compliance by the head and employees of the ACS with the requirements of the labor regulations and other internal documents of the Company in the part that does not contradict the norms of these Regulations and (or) the organizational status of the ACS;

2) acceptance of an application and issuance of an order for the vacation of the head and employees of the ACS in accordance with the labor legislation of the Republic of Kazakhstan;

3) conclusion and (or) termination, within the framework of the labor legislation of the Republic of Kazakhstan, of employment contracts with the head and employees of the ACS on the basis of decisions taken in accordance with the internal documents of the Company;

4) business trips of the head and employees of the ACS.

34. In order to fulfill its tasks and functions, the ACS interacts and cooperates on its own initiative with any structural units.

35. In the framework of interaction with the Board of the ACS:

- 1) provides the Management Board with information on compliance risks and violations in accordance with internal regulatory documents;
- 2) makes proposals to the Management Board on improving compliance control.

36. The Management Board of the Company must:

- 1) to contribute to the creation of an effective environment for the implementation of the activities of the ACS, to assist the ACS in fulfilling its goals, tasks, functions and responsibilities, in the implementation of the rights of the ACS;

- 2) provide administrative (organizational and technical) support for the activities of the ACS, including providing the ACS with the necessary capabilities, assets and resources for its activities, including information systems and applications (access to the necessary databases) and other goods, works, services for the implementation of appropriate control and compliance inspections;

- 3) in accordance with the established procedure, provide the head and employees of the ACS with training and certification opportunities on the activities of the ACS, advanced training on the Company's activities, social and communication skills and competencies, as well as reimbursement of official travel expenses.

37. The interaction of the ACS with the divisions of the Company is based on mutual politeness and correctness in work.

38. Employees of the Company's divisions are obliged to assist the ACS in the implementation of its tasks, functions, duties and rights, which, among other things, is expressed in:

- 1) provision of all documents and all information necessary for the implementation of the tasks and functions of the ACS;
- 2) objective discussion of the identified risks and violations;
- 3) joint solution of emerging issues and problems.

39. The Company's divisions are obliged to inform the ACS on the compliance risks realized in the reporting period and provide other information at the request of the ACS.

Chapter 8. Final provisions

40. These Regulations come into force from the moment of approval by the Board of Directors of the Company or from the date specified in the decision of the Board of Directors.

41. Amendments and additions to these Regulations may be made by a decision of the Company's Board of Directors.

Appendix
to the Regulations
on the Anti-Corruption Compliance Service of
Kazyna Capital Management
Joint Stock Company

**Job description
of the Head of the Anti-Corruption Compliance Service of
Kazyna Capital Management Joint Stock Company**

1. General provisions

1. This job description of an employee (compliance controller) of the Anti-Corruption Compliance Service of Kazyna Capital Management Joint Stock Company (hereinafter referred to as ACS) has been developed in accordance with the legislation of the Republic of Kazakhstan, the Charter of Kazyna Capital Management Joint Stock Company, the Regulations on the Anti-Corruption Compliance Service of Kazyna Capital Management Joint Stock Company (hereinafter referred to as The regulation on the ACS).

2. The Head of the ACS is appointed to the position and dismissed by the decision of the Board of Directors of Kazyna Capital Management Joint Stock Company (hereinafter referred to as the Company) upon presentation (recommendation) of the HR, Remuneration and Social Affairs Committee of the Company's Board of Directors (hereinafter referred to as the Committee).

An employment contract with the head of the ACS is concluded and terminated by the Chairman of the Management Board of the Company (or another person authorized by him/her) on the basis of a decision of the Board of Directors of the Company in accordance with the labor legislation of the Republic of Kazakhstan.

3. Supervision of the activities of the head of the ACS is carried out by the Committee.

The application and the order for the vacation of the head of the ACS is signed by the Chairman of the Management Board of the Company (another person authorized by him/her) in accordance with the labor legislation of the Republic of Kazakhstan.

4. In his/her professional activity, the head of the ACS must be guided by the legislation of the Republic of Kazakhstan, the Regulation on the ACS, other internal documents of the Company and this job description.

2. Qualification requirements

5. The head of the ACS must have:

- 1) higher education in law or economics and finance;
- 2) work experience in the professional sphere or in the fields of economics and finance - at least 3 (three) years;
- 3) work experience in the type of economic activity corresponding to the profile of the organization (preferably in the group of companies of NMH "Baiterek" JSC and/or public administration bodies) – at least 3 (three) years;
- 4) experience in managing a group of performers - at least 3 (three) years;
- 5) knowledge of regulatory legal acts of the Republic of Kazakhstan, including the Constitution of the Republic of Kazakhstan, the Civil Code of the Republic of Kazakhstan, the Budget Code of the Republic of Kazakhstan, the Code of the Republic of Kazakhstan "On Taxes and other mandatory payments to the Budget", the Entrepreneurial Code of the Republic of Kazakhstan, the Laws of the Republic of Kazakhstan "On Combating Corruption", "On Access to Information", "On Joint stock companies companies", "On limited and additional liability partnerships", "On State property" and other regulatory legal acts of the Republic of Kazakhstan;
- 6) knowledge of the state language at levels not lower than average.

6. It is not allowed to appoint a person to the position of the head of the ACS who has an unexpunged or outstanding criminal record in accordance with the procedure established by law for crimes committed in the field of economic activity, for corruption and other crimes against the interests of the public service or public administration, crimes against the foundations of the constitutional system and the security of the state.

3. Job responsibilities

7. The following responsibilities are assigned to the head of the ACS:

- 1) managing the activities of the ACS;
- 2) ensuring the organization of the work of the ACS, as well as the fulfillment of the tasks and functions assigned to the ACS in accordance with the internal documents of the Company and the regulations on the ACS;
- 3) consideration of appeals of individuals (individuals and legal entities) on corruption issues in the Company and Administration of the hotline, including receiving calls from individuals and legal entities on corruption issues in the Company with subsequent study of issues and taking appropriate measures;
- 4) conducting investigations of violations by officials and employees of the Company of the legislation of the Republic of Kazakhstan, guided by the norms of the legislation of the Republic of Kazakhstan and internal regulatory documents of the Company. Based on the results of the investigations, the management of the Company and its subsidiaries are provided with recommendations for the

elimination and adoption of corrective measures in relation to the detected inconsistencies with the requirements of the legislation of the Republic of Kazakhstan, regulatory acts, internal documents and procedures of the Company in order to manage compliance risks in the Company's work and Conduct compliance audits within the framework of compliance risk management based on the compliance risk map in order to verify control measures and mechanisms to minimize such risks;

5) collection, processing and analysis of data on inspections and requests of law enforcement agencies of the Republic of Kazakhstan in the Company and its subsidiaries in the framework of criminal and administrative proceedings in order to subsequently inform the management of the Company and take measures to prevent damage to the Company and its subsidiaries;

6) timely submission of reports to the authorized anti-corruption body in accordance with the established procedure; regular formation and submission to the Board of Directors of the Company of reports on the activities of the ACS in the framework of compliance risk management of the Company;

7) organization, together with interested structural divisions of the Company, of trainings and seminars for personnel training on issues related to compliance risk management and corruption risks, conducting tests on knowledge of the compliance risk management system and the legislation of the Republic of Kazakhstan on corruption (formation of compliance culture) and advising structural divisions of the Company on issues related to in the competence of the ACS;

8) management of key internal and external relationships. As the head of the structural division of the Company, builds and develops relationships with key decision makers and stakeholders, creates and maintains a network of partnerships with colleagues and representatives of government agencies in order to effectively make decisions, protect interests and build a positive reputation of the Company;

9) investigations and compliance inspections within the framework of compliance risk management and anti-corruption systems;

10) formation of a compliance culture, including an anti-corruption culture through training activities for the Company's employees;

11) planning the activities of the ACS in accordance with the established procedure;

12) monitoring of activities planned and (or) carried out by the Company in order for the Company's employees to fulfill recommendations, requirements based on the results of ACS inspections, as well as inspections by other authorized bodies;

13) taking measures to improve their professional qualifications;

14) initiation of consultations, discussions with members of the Board of Directors of the Company on issues within the competence of the ACS;

15) study and implementation of international experience on anti-corruption and compliance risk management;

16) monitoring of legislative, regulatory, analytical documents, and making appropriate proposals for amendments to the Company's internal procedures and documents;

17) making decisions on all issues within the competence of the ACS and performing other duties assigned to the ACS by the Board of Directors of the Company.

4. Rights

8. The head of the ACS has the following rights:

1) apply directly to members of the Board of Directors and the Management Board of the Company, other employees of the Company and officials of subsidiaries of the Company;

2) make suggestions for improving the work, developing the working methods of the ACS;

3) make proposals to determine the quantitative composition, the order of work of the ACS, organizational and technical support of the ACS;

4) get access to all necessary documents on the implementation of anti-corruption compliance control in the Company and subsidiaries of the Company (if necessary), including those containing commercial or other secrets, or having a confidentiality regime;

5) refuse to review, approve internal and other documents in case there is a threat of violation of the principles of objectivity and independence of the ACS and/or their non-compliance with the legislation of the Republic of Kazakhstan or internal documents of the Company, with the possible submission of a reasoned refusal and (or) proposals on the legal procedure for resolving the issues under consideration;

6) refuse to commit illegal acts or acts incompatible with generally accepted ethical standards that violate the internal regulatory documents of the Company and (or) the legislation of the Republic of Kazakhstan;

7) exercise other powers provided for by the legislation of the Republic of Kazakhstan and internal documents of the Company, as well as those arising from them;

8) contact directly and on their own initiative with members of the Management Board of the Company and its subsidiaries in order to promptly resolve issues;

9) within its competence to represent the Company in state and supervisory bodies, and other organizations;

10) to demand and freely obtain access to any information, data, documents, automated systems and databases without the possibility of correction (in viewing mode), including information constituting a commercial and other secret protected by the Law;

11) conduct correspondence, request and receive from other structural divisions, officials and bodies of the Company and its subsidiaries, information,

documents and explanations necessary to perform the tasks and functions of the ACS;

12) on its own initiative, cooperate with any divisions, collegial bodies, employees of the Company and subsidiaries of the Company, and get access to any documents, files and reports necessary for the performance of its duties;

13) to make copies of the received documents, to receive copies of files and other records stored in electronic databases, local computer networks and autonomous computer systems of the Company and its subsidiaries for the purposes of anti-corruption compliance control;

14) freely and unhindered express their opinions, send suggestions, recommendations and submit the results of inspections and information about violations to the Board of Directors, the Management Board of the Company and its subsidiaries,

15) to advise officials and employees of the Company on the application of legislation, policies and procedures of the Company in the field of anti-corruption;

16) take appropriate actions to eliminate the causes that created the conflict situation;

17) make proposals to the Board of Directors through the HR, Remuneration and Social Affairs Committee on improving the work of the ACS, including its organizational structure and staffing;

18) make suggestions for improving their professional qualifications, participation in conferences, internships, seminars, etc.;

19) require the provision of the necessary technical and material conditions sufficient for the effective and continuous performance of their functions;

20) require the Management Board of the Company to eliminate violations of the legislation of the Republic of Kazakhstan and internal documents of the Company;

21) participate in sessions, meetings, working groups, assemblies, audiences and other events of the Management Board and structural divisions of the Company on issues related to the competence of the ACS;

22) to make proposals on bringing to justice employees and (or) officials of the Company guilty of non-compliance with the requirements of the legislation of the Republic of Kazakhstan, internal documents of the Company;

23) prepare requests on behalf of the Company sent to state bodies, the Sole Shareholder and other organizations to resolve issues within the competence of the ACS;

24) develop recommendations that are mandatory for consideration by the Management Board and divisions of the Company, in case of violation of the law, make requirements for their elimination and receive appropriate responses upon consideration;

25) attend, if necessary, meetings of the Company's Board of Directors without the right to vote;

26) coordinate and (or) monitor the work during the audit by external organizations, including supervisory authorities, government agencies, external experts, with the exception of external audit and rating agencies;

27) require the heads of departments, officials and other responsible employees to ensure the safety of documents in case of violations of legislation and internal rules, policies, codes, expected fabrication, forgery or other abuses;

28) to demand from the Management Board of the Company and Subsidiaries of the Company the appointment of official inspections and investigations when violations are detected with mandatory notification of the results of the audit of the head of the ACS, as well as to control the process of their conduct;

29) to give orders and instructions to the Company's employees on the range of issues included in its functional responsibilities;

30) to receive oral and written explanations from employees of departments on issues arising during compliance control, including in the framework of anti-corruption procedures;

31) require the provision of internal documents, including administrative and accounting documents, in order to implement compliance control, including internal control procedures to counter corruption;

32) in case of non-fulfillment of the recommendations or requirements of the ACS by officials, heads of structural divisions and other employees of the Company, inform the Board of Directors about these facts, petition or make proposals in accordance with the established procedure on the application of disciplinary and other liability or other response measures against employees, including officials who have committed violations of internal regulatory documents, including policies, codes and procedures of the Company;

33) to send letters and requests to the Company's subsidiaries on the official letterhead of the Company on the basis of a power of attorney issued for conducting investigations or other inspections on issues related to the consideration of ACS appeals of individuals and legal entities;

34) other rights provided for by the legislation of the Republic of Kazakhstan and internal regulatory documents of the Company.

5. Responsibility

10. The head of the ACS, in accordance with the established procedure, is personally responsible for:

1) the quality and timeliness of performing the functions and tasks assigned to the ACS in accordance with this job description, the legislation of the Republic of Kazakhstan, the employment contract and other internal documents of the Company;

2) timely provision to the Board of Directors of the Company of information, data, and reports provided for by internal regulatory documents;

3) non-fulfillment or improper fulfillment of his duties assigned to him/her and provided for by the employment contract, this Job Description and other internal documents of the Company;

4) non-compliance with confidentiality requirements in work in accordance with the employment contract, the legislation of the Republic of Kazakhstan, internal documents of the Company;

5) admission of disclosure of information constituting a commercial secret of the Company, confidential information, except for cases stipulated by the legislation of the Republic of Kazakhstan;

6) organization, control, monitoring of internal control and risk management related to the tasks and functions assigned to the ACS.